

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
MANHATTAN DIVISION**

<b>InnoBrilliance, LLC,</b>  Plaintiff,  v.  <b>L3 Technologies, Inc.</b>  Defendant.	Case No. _____  Patent Case  Jury Trial Demanded
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**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff InnoBrilliance, LLC (“InnoBrilliance”), through its attorney, Isaac Rabicoff, complains of L3 Technologies, Inc. (“L3”), and alleges the following:

**PARTIES**

1. Plaintiff InnoBrilliance, LLC is a corporation organized and existing under the laws of Texas and maintains its principal place of business at 402 Roy Creek Ln, Dripping Springs, TX 78620.

2. Defendant L3 Technologies, Inc. is a corporation organized and existing under the laws of Delaware that maintains its principal place of business at 600 Third Avenue, New York, NY 10016.

**JURISDICTION**

3. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.

4. This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over L3 because it has engaged in systematic and continuous business activities in the Southern District of New York. Specifically, L3 provides its full range of services to residents in this District and has its principal place of business in this District. As described below, L3 has committed acts of patent infringement giving rise to this action within this District.

#### **VENUE**

6. Venue is proper in this District under 28 U.S.C. § 1400(b) because L3 has committed acts of patent infringement in this District and has its principal place of business in this District. In addition, InnoBrilliance has suffered harm in this district.

#### **PATENTS-IN-SUIT**

7. InnoBrilliance is the assignee of all right, title and interest in United States Patent No. 7,711,150 (the “’150 Patent”), United States Patent No. 7,881,498 (the “’498 Patent”), and United States Patent No. 8,009,870 (the “’870 Patent”) (collectively hereinafter “Patents-in-Suit”), including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the Patents-in-Suit. Accordingly, InnoBrilliance possesses the exclusive right and standing to prosecute the present action for infringement of the Patents-in-Suit by L3.

#### **The ’150 Patent**

8. On May 4, 2010, the United States Patent and Trademark Office issued the ’150 Patent. The ’150 Patent is titled “Autonomous Wide-Angle License Plate Recognition.” The application leading to the ’150 Patent was filed on August 22, 2005 and is a national stage entry of PCT/US03/21958, which was filed on July 10, 2003. A true and correct copy of the ’150 Patent is attached hereto as Exhibit A and incorporated herein by reference.

9. The '150 Patent is valid and enforceable.

10. The '150 Patent describes a need for traffic police, highway patrol and mobile security personnel to accurately and efficiently identify potential issues with regards to nearby vehicles. Ex. A, 1:10–14.

11. The '150 Patent describes systems and methods of capturing, from a surveillance vehicle, “vehicle license plate number information” from a targeted vehicle “in a fully autonomous fashion.” Ex. A, 1:61-64. This captured license plate information is then applied “against a database to identify potential problems with the [targeted] vehicle or its driver.” *Id.* at 1:65-66.

12. The '150 Patent claims are not directed to a method of organizing human activity or to a fundamental economic practice long prevalent in commerce. The '150 Patent describes a system that addresses a technical problem—how to make license plate recognition of a targeted moving vehicle, captured from a surveillance vehicle, into a fully autonomous system, *id.* at 1:55-57—with a technical solution: using continuously-running cameras (e.g., digital video cameras with wide-angle lenses) mounted in a surveillance vehicle that automatically capture the image of a license plate from a target vehicle, regardless of whether the target and surveillance vehicles are in the same lane; using a process that continuously runs character recognition to identify potential problems related to the target vehicle; and notifying the operator with an alert if a problem is identified. *Id.* at 2:5-24.

13. The '150 Patent does not preempt the field or preclude the use of other license plate recognition systems. The claims are directed to capturing images of the target vehicle's license plate (a) “without a need for input from the operator,” and (b) “regardless of whether the target vehicle[] [is] in a same lane as the surveillance vehicle, or in left or right adjacent lanes to

that of the surveillance vehicle.” *Id.* at claim 1. The ’150 Patent identifies other license plate recognition systems that lack these two features of the claims, and instead “(a) forcing the driver of the [surveillance] car to maneuver his vehicle relative to the target vehicle, and (b) forcing the operator to trigger the camera, [which] involve[s] conscious efforts on the part of the driver.” *Id.* at 1:44-45.

14. The ’150 Patent does not take a well-known or established business method or process and apply it to a general-purpose computer. Instead, the specific system and processes described in the ’150 Patent have no direct corollary to a well-known business process. The ’150 Patent describes a system that addresses a technical problem that arises in the context of providing autonomous license plate surveillance. *See id.*, 1:61-66. As non-autonomous license plate recognition systems attached to surveillance vehicles (e.g., for traffic police) have become prevalent, technical problems arose with how to safely and effectively use these systems given that these systems “forc[e] the driver of the [surveillance] car to maneuver his vehicle relative to the target vehicle, and . . . forc[e] the operator to trigger the camera, [which] involve[s] conscious efforts on the part of the driver.” *Id.*, 1:44-45. The ’150 Patent’s solution has improved computer technology by rendering such a vehicle-mounted license plate recognition system fully autonomous. *See id.*, 2:5-24.

### **The ’498 Patent**

15. On February 1, 2011, the United States Patent and Trademark Office issued the ’498 Patent. The ’498 Patent is titled “Autonomous Wide-Angle License Plate Recognition.” The application leading to the ’498 Patent was filed on April 9, 2010, which is a continuation of U.S. Patent No. 10/546,555, leading to the ’150 Patent; which is a National Stage Entry of

PCT/US03/21958, which was filed on August 3, 2003. A true and correct copy of the '498 Patent is attached hereto as Exhibit B and incorporated herein by reference.

16. The '498 Patent is valid and enforceable.

17. The '498 Patent describes a need for traffic police, highway patrol and mobile security personnel to accurately and efficiently identify potential issues with regards to nearby vehicles. Ex. B, 1:20–24.

18. The '498 Patent describes systems and methods of capturing, from a surveillance vehicle, “vehicle license plate number information” from a targeted vehicle “in a fully autonomous fashion.” Ex. B, 2:5-6. This captured license plate information is then applied “against a database to identify potential problems with the [targeted] vehicle or its driver.” *Id.* at 2:7-8.

19. The '498 Patent claims are not directed to a method of organizing human activity or to a fundamental economic practice long prevalent in commerce. The '498 Patent describes a system that addresses a technical problem—how to make license plate recognition of a targeted moving vehicle, captured from a surveillance vehicle, into a fully autonomous system, *id.* at 1:60-65—with a technical solution: using continuously-running cameras (e.g., digital video cameras with wide-angle lenses) mounted in a surveillance vehicle that automatically capture the image of a license plate from a target vehicle, regardless of whether the target and surveillance vehicles are in the same lane; using a process that continuously runs character recognition to identify potential problems related to the target vehicle; and notifying the operator with an alert if a problem is identified. *Id.* at 2:5-28.

20. The '498 Patent does not preempt the field or preclude the use of other license plate recognition systems. The claims are directed to capturing images of the target vehicle's

license plate (a) “without a need for input from the operator,” and (b) “regardless of whether the target vehicle[] [is] in a same lane as the surveillance vehicle, or in left or right adjacent lanes to that of the surveillance vehicle.” *Id.* at claim 1. The ’498 Patent identifies other license plate recognition systems that lack these two features of the claims, and instead “(a) forcing the driver of the [surveillance] car to maneuver his vehicle relative to the target vehicle, and (b) forcing the operator to trigger the camera, [which] involve[s] conscious efforts on the part of the driver.” *Id.* at 1:52-55.

21. The ’498 Patent does not take a well-known or established business method or process and apply it to a general-purpose computer. Instead, the specific system and processes described in the ’498 Patent have no direct corollary to a well-known business process. The ’498 Patent describes a system that addresses a technical problem that arises in the context of providing autonomous license plate surveillance. *See id.*, 1:60-65. As non-autonomous license plate recognition systems attached to surveillance vehicles (e.g., for traffic police) have become prevalent, technical problems arose with how to safely and effectively use these systems given that these systems “forc[e] the driver of the [surveillance] car to maneuver his vehicle relative to the target vehicle, and . . . forc[e] the operator to trigger the camera, [which] involve[s] conscious efforts on the part of the driver.” *Id.*, 1:52-55. The ’498 Patent’s solution has improved computer technology by rendering such a vehicle-mounted license plate recognition system fully autonomous. *See id.*, 2:5-28.

### **The ’870 Patent**

22. On August 30, 2011, the United States Patent and Trademark Office issued the ’870 Patent. The ’870 Patent is titled “Autonomous Wide-Angle License Plate Recognition.” The application leading to the ’870 Patent was filed on December 17, 2010, which is a

continuation of U.S. Patent Application No. 12/757,262, leading to the '498 Patent; which is a continuation of U.S. Patent No. 10/546,555, leading to the '150 Patent; which is a National Stage Entry of PCT/US03/21958, which was filed on August 3, 2003. A true and correct copy of the '870 Patent is attached hereto as Exhibit C and incorporated herein by reference.

23. The '870 Patent is valid and enforceable.

24. The '870 Patent describes a need for traffic police, highway patrol and mobile security personnel to accurately and efficiently identify potential issues with regards to nearby vehicles. Ex. C, 1:23–28.

25. The '870 Patent describes systems and methods of capturing, from a surveillance vehicle, “vehicle license plate number information” from a targeted vehicle “in a fully autonomous fashion.” Ex. C, 2:7-10. This captured license plate information is then applied “against a database to identify potential problems with the [targeted] vehicle or its driver.” *Id.* at 2:11-12.

26. The '870 Patent claims are not directed to a method of organizing human activity or to a fundamental economic practice long prevalent in commerce. The '870 Patent describes a system that addresses a technical problem—how to make license plate recognition of a targeted moving vehicle, captured from a surveillance vehicle, into a fully autonomous system, *id.* at 2:1-3—with a technical solution: using continuously-running cameras (e.g., digital video cameras with wide-angle lenses) mounted in a surveillance vehicle that automatically capture the image of a license plate from a target vehicle, regardless of whether the target and surveillance vehicles are in the same lane; using a process that continuously runs character recognition to identify potential problems related to the target vehicle; and notifying the operator with an alert if a problem is identified. *Id.* at 2:18-37.

27. The '870 Patent does not preempt the field or preclude the use of other license plate recognition systems. The claims are directed to capturing images of the target vehicle's license plate (a) "autonomously," and (b) in multiple lanes of traffic, "in the first lane in front of the autonomous vehicle . . . in a second lane to the left of the surveillance vehicle . . . in a third lane to the right of the surveillance vehicle, and . . . traveling in the first lane behind the surveillance vehicle." *Id.* at claim 1. The '870 Patent identifies other license plate recognition systems that lack these two features of the claims, and instead "(a) forcing the driver of the [surveillance] car to maneuver his vehicle relative to the target vehicle, and (b) forcing the operator to trigger the camera, [which] involve[s] conscious efforts on the part of the driver." *Id.* at 1:55-57.

28. The '870 Patent does not take a well-known or established business method or process and apply it to a general-purpose computer. Instead, the specific system and processes described in the '870 Patent have no direct corollary to a well-known business process. The '870 Patent describes a system that addresses a technical problem that arises in the context of providing autonomous license plate surveillance. *See id.*, 1:58-65. As non-autonomous license plate recognition systems attached to surveillance vehicles (e.g., for traffic police) have become prevalent, technical problems arose with how to safely and effectively use these systems given that these systems "forc[e] the driver of the [surveillance] car to maneuver his vehicle relative to the target vehicle, and . . . forc[e] the operator to trigger the camera, [which] involve[s] conscious efforts on the part of the driver." *Id.*, 1:55-57. The '870 Patent's solution has improved computer technology by rendering such a vehicle-mounted license plate recognition system fully autonomous. *See id.*, 2:7-38.



**COUNT I: INFRINGEMENT OF THE '150 PATENT**

29. InnoBrilliance incorporates the above paragraphs herein by reference.

30. **Direct Infringement.** L3 has been and continues to directly infringe at least claim 1 of the '150 Patent in this District and elsewhere in the United States by selling a license plate recognition ("LPR") camera system.

31. In particular, L3 sells the LPR Camera System to surveil vehicles and to capture images of license plates ("L3's LPR camera system").

32. L3's LPR camera system satisfies the preamble of claim 1: "a system for alerting an operator of a moving surveillance vehicle with respect to first and second license plates on moving first and second target vehicles within camera surveillance distance of the surveillance vehicle, respectively." For example, L3's LPR camera system surveils vehicles and captures license plate images. The LPR camera system scans each license plate image to determine the license plate number. See [https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu\\_Overview\\_Data\\_Sheet-Web.pdf](https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu_Overview_Data_Sheet-Web.pdf), Figure 1.



*Figure 1. L3's LPR camera system scans license plates to determine the license plate numbers.*

33. For example, L3's LPR camera system also allows the capturing of license plate information while the surveillance vehicle and target vehicle are both moving. *See* Figure 1.

34. The captured license plate number is compared to a hotlist of targeted license plate numbers. If a match between the captured license plate number and the hotlist occurs, the vehicle is alerted. *See* Figure 1.

35. L3's LPR camera system satisfies claim element 1(a)(1): "at least first and second cameras mounted on the surveillance vehicle." For example, L3's LPR camera system has two cameras mounted on the vehicle. *See* <http://www.mobile-vision.com/products/mobile-license-plate-recognition-lpr/>, Figure 2.

## Cruising Eyes With The Mobile LPR.

L3's AlertVU™ Mobile License Plate Recognition (LPR) System allows you to mount multiple cameras on each vehicle. Use it for highway interdiction, as well as parking lot and neighborhood patrols. It works as a constant revenue generator!

*Figure 2. L3's LPR camera system has two cameras that are mounted on the vehicle.*

36. L3's LPR camera system satisfies claim element 1(a)(2): "collectively configured to capture, without a need for input from the operator, images of each of the license plates of the target vehicles regardless of whether the target vehicles are in a same lane as the surveillance vehicle, or in left or right adjacent lanes to that of the surveillance vehicle." For example, L3's LPR camera system scans each license plate of target vehicles in multiple lanes of traffic. An image of the license plate is captured, and the license plate scan data is saved. With two cameras, L3's LPR camera system captures license plate information from the target vehicle, without the need for operator input, regardless of whether the target vehicle is in the same lane or an adjacent lane to the vehicle. *See* Fig. 1.

37. L3's LPR camera system satisfies claim element 1(b): "at least one processor carried by the surveillance vehicle that continuously uses character recognition to determine the first and second license plate numbers only upon discovering that there is a potential problem related to the second or third moving vehicles, all without a need for input from the operator." For example, L3's LPR camera system uses LPR cameras. The LPR camera system scans license plate images to determine the license plate number. See [https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu\\_Overview\\_Data\\_Sheet-Web.pdf](https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu_Overview_Data_Sheet-Web.pdf), Figure 3.



*Figure 3. L3's LPR camera system uses LPR cameras. The LPR camera system scans license plate images to determine the license plate number.*

38. For example, L3's LPR camera system also allows the capturing of license plate information while the surveillance vehicle and target vehicle are both moving. See Fig. 3.

39. L3's LPR camera system includes a hotlist of license plate information for vehicles. The application software continuously scans license plate data to identify license plate numbers from the captured license plate images. See Fig. 3.

40. When a license plate number matches a hotlist, the driver is alerted. See Fig. 3.

41. Accordingly, every element of claim 1 is satisfied by L3's LPR camera system.

42. InnoBrilliance is entitled to recover damages adequate to compensate it for such infringement in an amount no less than a reasonable royalty under 35 U.S.C. § 284.

## COUNT II: INFRINGEMENT OF THE '498 PATENT

43. InnoBrilliance incorporates the above paragraphs herein by reference.

44. **Direct Infringement.** L3 has been and continues to directly infringe at least claim 1 of the '498 Patent in this District and elsewhere in the United States by selling a license plate recognition ("LPR") vehicle system.

45. In particular, L3 sells the LPR Camera System to surveil vehicles and to capture images of license plates ("L3's LPR camera system").

46. L3's LPR camera system satisfies the preamble of claim 1 by performing: "a method of surveilling multiple target vehicles." For example, L3's LPR camera system surveils vehicles and captures license plate images. The LPR camera system scans each license plate image to determine license plate numbers. See <http://www.mobile-vision.com/products/mobile-license-plate-recognition-lpr/>, Fig. 4.

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*Figure 4. L3's LPR camera system scans license plates to determine the license plate numbers.*

47. Each captured license plate number is compared to a hotlist of targeted license plate numbers. If a match between the captured license plate number and the hotlist occurs, the vehicle is alerted. See [https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu\\_Overview\\_Data\\_Sheet-Web.pdf](https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu_Overview_Data_Sheet-Web.pdf); Fig. 5.



*Figure 5. L3's LPR camera system captures license plate information and alerts the vehicle if there is a match to a number on the hotlist.*

48. L3's LPR camera system has two cameras that are mounted on the vehicle; the ALPR vehicle system is mounted on the vehicle. *See* Fig. 4.

49. L3's LPR camera system satisfies claim element 1(a) by performing the step of: "providing or operating the surveillance vehicle with a camera system disposed to capture information on each of the target vehicles regardless of whether the target vehicles are in a same lane as the surveillance vehicle, or in left or right adjacent lanes to that of the surveillance vehicle, while the surveillance and the target vehicles are all moving." For example, L3's LPR camera system scans each license plate of target vehicles in multiple lanes of traffic. An image of the license plate is captured, and the license plate scan data is saved. With two cameras, L3's LPR camera system captures license plate information from the target vehicle, without the need for operator input, regardless of whether the target vehicle is in the same lane or an adjacent lane to the vehicle. *See* [https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu\\_Overview\\_Data\\_Sheet-Web.pdf](https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu_Overview_Data_Sheet-Web.pdf); Figs. 5, 6.



*Figure 6. With multiple cameras, L3’s LPR camera system captures license plate information from the target vehicle, without the need for operator input, regardless of whether the target vehicle is in the same lane or an adjacent lane to the vehicle.*

50. For example, L3’s LPR camera system also allows the capturing of license plate information while the surveillance vehicle and target vehicle are both moving. *See* Fig. 6.

51. L3’s LPR camera system satisfies claim element 1(b) by performing the step of: “providing or operating the surveillance vehicle with a computer programmed to use the license plate information to determine license plate numbers for each of the target vehicles, and alert an operator of the surveillance vehicle only upon discovering that there is a potential problem related to one of the target vehicles, all without a need for input from the operator.” For example, L3’s LPR camera system scans license plate images to determine the license plate number through a processing unit and proprietary system that L3 provides. *See* Fig. 6.

52. The application software identifies license plate numbers from the captured license plate images. *See* Fig 6.

53. When a license plate number matches a national hotlist, the driver is alerted. *See* Fig. 6.

54. Accordingly, every element of claim 1 is satisfied by L3’s LPR camera system.

55. InnoBrilliance is entitled to recover damages adequate to compensate it for such infringement in an amount no less than a reasonable royalty under 35 U.S.C. § 284.

**COUNT III: INFRINGEMENT OF THE '870 PATENT**

56. InnoBrilliance incorporates the above paragraphs herein by reference.

57. **Direct Infringement.** L3 has been and continues to directly infringe at least claim 1 of the '870 Patent in this District and elsewhere in the United States by selling a vehicle ("LPR") vehicle system.

58. In particular, L3 sells the LPR Camera System to surveil vehicles and to capture images of license plates ("L3's LPR camera system").

59. L3's LPR camera system satisfies the preamble of claim 1: "a system for alerting an operator of a surveillance vehicle moving in a first lane, with respect to (a) a first license plate on a first target vehicle traveling in the first lane in front of the surveillance vehicle, (b) a second license plate on a second target vehicle traveling in a second lane to the left of the surveillance vehicle, (c) a third license plate on a third target vehicle traveling in a third lane to the right of the surveillance vehicle, and (d) a fourth license plate on a fourth target vehicle traveling in the first lane behind the surveillance vehicle." For example, L3's LPR camera system surveils vehicles and captures license plate images. The LPR camera system scans each license plate image to determine the license plate number. See [https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu\\_Overview\\_Data\\_Sheet-Web.pdf](https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu_Overview_Data_Sheet-Web.pdf), Fig. 7.



*Figure 7. L3's LPR camera system scans license plates to determine the license plate numbers.*

60. For example, L3's LPR camera system also allows the capturing of license plate information while the surveillance vehicle and target vehicle are both moving. See [https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu\\_Overview\\_Data\\_Sheet-Web.pdf](https://www.mobile-vision.com/wp-content/uploads/2019/04/AlertVu_Overview_Data_Sheet-Web.pdf), Fig. 8.



*Figure 8. L3's LPR camera system captures license plate information and allows the police officer to keep driving.*



61. The captured license plate number is compared to a hotlist of targeted license plate numbers. If a match between the captured license plate number and the hotlist occurs, the vehicle is alerted. *See* Fig. 7.

62. L3's LPR camera system satisfies claim element 1(a): "at least a first camera mounted on the surveillance vehicle, collectively figured to autonomously capture images of each of the license plates." For example, L3's LPR camera system contains two cameras that are mounted on the vehicle. *See* Fig. 7.

63. L3's LPR camera system scans each license plate of target vehicles in multiple lanes of traffic. An image of the license plate is captured, and the license plate scan data is saved. With two cameras, L3's LPR camera system captures license plate information from the target vehicle, without the need for operator input, regardless of whether the target vehicle is in the same lane or an adjacent lane to L3's vehicle. *See* Fig. 7.

64. L3's LPR camera system satisfies claim element 1(b): "at least one processor carried by the surveillance vehicle that autonomously applies character recognition to the images to determine corresponding license plate numbers, and to autonomously alert the operator when any one of the license plate numbers matches an entry in a database relating to a possible law enforcement-related problem." For example, L3's LPR camera system scans license plate images to determine the license plate number and is mounted on the patrol car. *See* <http://www.mobile-vision.com/products/mobile-license-plate-recognition-lpr/>, Fig. 9.

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*Figure 9. L3's LPR camera system scans license plate images to determine the license plate number and is mounted on the patrol car.*

65. L3's LPR software system includes a hotlist of license plate information for vehicles. The application software identifies license plate numbers from the captured license plate images. *See* Fig. 9.

66. When a license plate number matches a hotlist, the driver is alerted. *See* Fig. 9.

67. Accordingly, every element of claim 1 is satisfied by L3's LPR camera system.

68. InnoBrilliance is entitled to recover damages adequate to compensate it for such infringement in an amount no less than a reasonable royalty under 35 U.S.C. § 284.

#### **JURY DEMAND**

69. Under Rule 38(b) of the Federal Rules of Civil Procedure, InnoBrilliance respectfully requests a trial by jury on all issues so triable.

#### **PRAYER FOR RELIEF**

WHEREFORE, InnoBrilliance asks this Court to enter judgment against L3, granting the following relief:

- A. A declaration that L3 has infringed the Patents-in-Suit;
- B. An award of damages to compensate InnoBrilliance for L3's direct infringement of the Patents-in-Suit;
- C. An award of damages, including trebling of all damages, sufficient to remedy L3's infringement of the Patents-in-Suit under 35 U.S.C. § 284;
- D. An accounting of all damages not presented at trial;
- E. A declaration that this case is exceptional, and an award to InnoBrilliance of reasonable attorneys' fees, expenses and costs under 35 U.S.C. § 285;
- F. An award of prejudgment and post-judgment interest; and
- G. Such other relief as this Court or jury may deem proper and just.

Dated: June 4, 2019

Respectfully submitted,

/s/ Isaac Rabicoff

Isaac Rabicoff

(*Pro Hac Vice* admission pending)

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